

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION**

**BORE-FLEX INDUSTRIES, INC., et al.,** )  
  )  
  )  
**Plaintiffs**                                  )  
  )  
  )  
**vs.**  )      **Case No. 6:11- cv-03112-BCW**  
  )  
  )  
**TODD A. VOLKER,**                          )  
  )  
**Defendant.**                                  )

**DEFENDANT TODD VOLKER'S MOTION FOR RULE 11 SANCTIONS  
AGAINST PLAINTIFF AND ITS COUNSEL**

Defendant Todd A. Volker, pursuant to Rule 11 Fed.R.Civ.P., moves the Court for its Order imposing sanctions against plaintiff Bore-Flex Industries, Inc. and its counsel, Carnahan, Evans, Cantwell & Brown, P.C., Rodney H. Nichols, Neale & Newman, L.L.P., and Paul G. White. For the reasons stated in the accompanying Suggestions, the Court should impose Rule 11 monetary sanctions against Bore-Flex and its counsel for filing and prosecuting Bore-Flex's Complaint against defendant Volker.

Respectfully submitted,

**COLANTUONO BJERG GUINN, LLC**

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 29th day of October, 2014 a copy of the above pleading was filed electronically with the Clerk of the Court via the CM/ECF system which will send a notice of electronic filing to all counsel of record.

/s/ Robert J. Bjerg

Attorney for Defendant Todd Volker